

REMARKS/ARGUMENTS

Claims 14-17 and 26-46 are pending.

Claims 1-25 were rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Grantham et al. (US Patent No. 6,215,495 - herein "Grantham") in view of "Using Oracle Jdeveloper and Business Components for Java with Oracle InterMedia", February 2001.

Claims 14 and 17 have been amended. Claims 1-13 and 18-25 have been canceled without prejudice or disclaimer in favor of appended claims 26-46.

Claim 14 recites a rendering method comprising receiving at a rendering service a rendering request from a user site. The request includes among other things identifiers of rendering resources that are at the user site. A resource pool is maintained at the rendering service comprising at least one rendering resource from a previous rendering request. A generated rendering resource is generated and stored at the rendering service based on a comparison between rendering resources in the resource pool and at the user site.

Rendering within Grantham is performed at a user's computer, rather than at a rendering service. In column 4, line 63 - column 5, line 5, Grantham describes the submission of a request from the user to a server. In response, a VRML file is sent back from the server to the user. The VRML file instructs various components of the user's computer to perform function calls on persistent data objects which render the images at the user's computer, not at the server. The rendering occurs at the user computer, and so Grantham fails to disclose or even suggest the recited method of rendering at a rendering service.

Claim 14 recites maintaining a resource pool comprised of rendering resources at the rendering service. However, the persistent data objects disclosed in Grantham column 4, lines 20-21 are not located at a different location, but are in fact stored at the user's computer. Rendering the graphics at the local user's computer teaches away from having additional processing resources located at a rendering service for the purpose of increasing speed and efficiency of the graphics being rendered, or even having the resources maintained at the

rendering service at all. For this reason, Grantham fails to teach or suggest maintaining a resource pool at the rendering service.

Claim 14 further recites comparing the identifiers of the rendering resources at the resource pool with the identifiers of the rendering resources at the user site. No mention is made within Grantham of comparing the identifiers of the rendering resources at two different locations. The VRML file within Grantham sent to the user contains commands to perform certain functions on persistent data objects located on the user's computer. It is noted that the persistent data objects are located solely at the user's computer and not at a rendering service, making a comparison between two sets of the persistent data objects at the rendering service unnecessary. Traversing through the data objects serves to propagate changes through the scene graph in order to draw and animate the graphics, but this in no way constitutes making a comparison to a disparate set of data objects located on the server side. For this reason, Grantham fails to teach or suggest comparing the resources present at the user site with those contained in a resource pool at a rendering service.

Claim 14 further recites generating and storing generated rendering resources at the rendering service. For the reasons discussed, Grantham does not show or suggest this recited aspect of claim 14.

Independent claim 26 recites a rendering method comprising among other things uploading a required rendering resource from the user site if the required rendering resource is not already stored in a data store local to the rendering server computer system. Claim 26 further recites obtaining a required rendering resource from a data store local to the rendering server if the required rendering resource is already stored in the local data store. See also independent claims 37 and 42. Grantham does not show the uploading of resources to the rendering service, but instead only describes a request being sent by the user to the server. No mention is made of uploading resources from the user's computer to the server. For this reason, Grantham et al. fails to show this element of recited claim 26.

Based upon the failure of the prior art relied upon by the Examiner to teach or suggest the foregoing discussed elements of the pending claims, it is respectfully asserted that

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these claims are not obvious. The pending obviousness claim rejections are improper and should be withdrawn.

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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